

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-10473PBS

CAPCO STEEL CORPORATION,

Plaintiff

v.

CLARK/HUBER, HUNT & NICHOLS/BERRY, a joint venture,

NATIONAL UNION FIRE INSURANCE COMPANY OF

PITTSBURGH, PA,

FEDERAL INSURANCE COMPANY,

FIDELITY AND DEPOSIT COMPANY OF MARYLAND,

ZURICH AMERICAN INSURANCE COMPANY,

UNITED STATES FIDELITY AND GUARANTY

INSURANCE COMPANY,

ST. PAUL FIRE AND MARINE INSURANCE COMPANY,

Defendants

JOINT STATEMENT OF PROPOSED PRETRIAL SCHEDULE

In accordance with Local Rule 16.1, the parties hereby jointly move to propose the following pretrial schedule:

Deadline

October 12, 2005: File all amended pleadings or motion to amend

April 12, 2006: Completion of Discovery

June 12, 2006: Deadline for Filing Dispositive Motions

August 11, 2006: Final Pretrial Conference

Counsel hereby certify, in accordance with Local Rule 16.1(D)(3) (and will separately provide the Court with certifications, signed by their respective clients), that counsel and the clients have conferred with respect to a budget for the full litigation process and alternative courses, and with respect to alternative dispute resolution.

Respectfully submitted,

CLARK/HUBER, HUNT &
NICHOLS/BERRY,
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,
FEDERAL INSURANCE COMPANY,

FIDELITY AND DEPOSIT COMPANY OF
MARYLAND,
ZURICH AMERICAN INSURANCE
COMPANY, UNITED STATES FIDELITY
AND GUARANTY INSURANCE
COMPANY,
ST. PAUL FIRE AND MARINE INSURANCE
COMPANY,

By their attorneys,

/s Stanley A. Martin

Stanley A. Martin, BBO #543937
HOLLAND & KNIGHT LLP
10 St. James Avenue
Boston, MA 02116
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August 15, 2005

Respectfully Submitted

CAPCO STEEL CORPORATION

By its attorneys,

/s David M. Campbell

David M. Campbell, Esq.
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